Rebecca Klein

Brett A. Perlman
Commissioner

Julie Parsley
Commissioner

W. Lane Lanford
Executive Director



Public Utility Commission of Texas

TO: Interested Parties

FROM: Nara Srinivasa, Telecommunications Division

Roger Stewart, Legal & Enforcement Division

RE: Project No. 20400 - § 271 Compliance Monitoring of Southwestern

Bell Telephone Company

Final Report, HP Audit of SBC re PM 13 & LMOS

Amended Staff Recommendations on Issues Raised by SBC and CLECs

DATE: April 15, 2003

On April 8, 2003, Commission Staff submitted its Recommendations on issues raised by SBC and certain CLECs in regard to the HP Final Report on its audit of SBC regarding PM 13 and LMOS. Upon review of its Recommendations, Staff observed that several statements needed revision and therefore submits the attached Amended Recommendations. The primary changes are explained as follows:

throughout: include HP Findings Summaries verbatim rather than paraphrased

p. 22 (§3, PM13 Accuracy of Current Reporting, Objective 3): In the leftmost ("Issues") column, Staff had inserted HP's findings generally as originally stated in HP's Final Report (Nov. 27, 2002). Later, however, HP filed a letter (Dec. 13, 2002) to correct Item 3 under the Findings Summary of Objective 3 on page 36 of the Final Report. The phrase "SWBT counts" was changed to "SWBT does not count" – this correction has now been reflected in the revised Staff Recommendations attached to this letter. Furthermore, Staff's corresponding recommendation on that point has been clarified as shown in the attachment.

p. 41 (§4, PM 13 Accuracy of SBC Restatement of PM 13, Objective 1): Staff's recommendation is rewritten to be consistent with Staff's intent.

p. 64 (§7, LMOS – Current PM reporting on LMOS Related Performance Measures, Objective 6): Staff's recommendation is rewritten to be consistent with Staff's intent.

Reminder: Staff intends to place this issue on the Commission's agenda for its **open meeting** on Friday, **May 9**, 2003. Any party wanting to provide **comments** to the Commission on the Staff recommendations shall file them in Project No. 20400 by Monday, **April 21**, 2003. Comments should be no longer than 20 pages and should be entitled "[Commenter's Name] Comments on

Staff Recommendations on HP Audit." Staff requests that comments also be provided via email to the following addresses:

Nara.Srinivasa@puc.state.tx.us Roger.Stewart@puc.state.tx.us

In addition, rather than providing service by paper copy to all interested parties, each commenter shall submit comments electronically to the Commission's email list known as SWBTAUD. Any interested party not yet subscribing to that email list may do so by navigating to this URL and following the subscription instructions:

http://puclist.puc.state.tx.us/scripts/telesubscribe.asp

Further information regarding this project may be found at:

http://www.puc.state.tx.us/telecomm/projects/20400/20400.cfm

cc:
Commissioners' Offices (8)
Durso, Susan
Featherston, David
Gage, Theresa
Hunter, Tom (2)
Journeay, Stephen
Lanford, Lane
Mueller, Paula
Renfro, Mike
Whittington, Pam